



STATE OF UTAH
NATURAL RESOURCES & ENERGY
Oil, Gas & Mining

Scott M. Matheson, Governor
Temple A. Reynolds, Executive Director
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November 22, 1982

Mr. Richard Blubaugh
Atlas Minerals Corporation
P.O. Box 1207
Moab, UT 84532

ATC 1019/007

RE: Atlas Minerals
Permitting Reclamation Revegetation
Methodology
All files
Emery, Grand, San Juan Counties, UT

Dear Mr. Blubaugh:

In light of recent discussions concerning the development of a specific reclamation/revegetation policy pertinent to all Atlas Minerals' mines, I am addressing you with the Division's final concerns. As you know, the approval of the most recently adopted surety contract is contingent upon the satisfactory development of a revegetation plan which will specifically establish a level or standard that will enable the Division to determine whether or not success has been achieved during reclamation. In order to provide this information as part of the reclamation plan, certain characteristics i.e. criteria, need to be proposed and committed to by Atlas Minerals in order to provide some type of measuring device which will indicate that "all practical land treatments have been attempted" per Rule M-12(3).

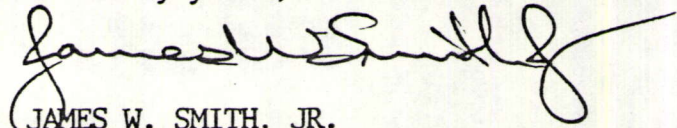
It seems apparent that the research proposal developed by Morrison Knudsen entitled Methodology for Reclamation/Revegetation of Uranium Mined Lands in Utah and Colorado would be sufficient to satisfy the Division's concerns in terms of this required effort, if accepted by Atlas as proposed. However, a letter attached to it dated October 15, 1982 to Susan Linner qualifies certain aspects of the report and certainly negates particular recommended proposals contained therein for one reason or another. Although Morrison Knudsen's report need not be officially adopted as policy by Atlas, the Division recommends that the proposed ideas at least be tried and incorporated into test plots or demonstration sites. The letter to Ms. Linner confirms Atlas' willingness to do part of this, as I understand the situation. However, the letter does not propose any commitment to institute any specific types of demonstration activities, nor does it declare where these may occur. Therefore, to establish compliance with the Mined Land Reclamation Act and complete the necessary arrangements prior to final approval, the Division is requesting further details regarding what Atlas will accomplish in a prescribed, mutually agreed upon, time frame.

The following issues should be incorporated into Atlas' commitment:

1. In terms of bonding, a cost estimate per mine site should incorporate a worst case figure, i.e. most expensive revegetation costs likely to be incurred.
2. Transplanting techniques should be incorporated into the demonstration site designs and include "critical area" examples such as slopes and southern exposures.
3. Mulch and fertilizer should be implemented as factors in the test plots.
4. A seed list should be developed which would include all possible selections which may be used during reclamation at particular mine sites. Alternative plantings chosen from this list may be used depending on variability and cost from year to year so long as a minimum selection is picked, i.e. grasses, forbs, and shrubs in terms of pounds of pure live seed (PLS) per acre.
5. The specific demonstration site designs should be forwarded to the Division for approval within thirty (30) days after final approval of the overall plan is issued by the Division.
6. The feasibility of successful revegetation at various mines due to slope steepness and soil conditions etc., will have to be demonstrated (e.g., locate a demonstration site at either Cane Creek or Standard II and provide for representation of generally difficult conditions).

I hope these issues make it apparent that a final report and/or commitment from Atlas Minerals is necessary to bring the permitting matter to a close. I believe, as you have stressed with regard to Atlas Minerals, that the Division also should not be judged on prior reviews or standards of effectiveness. General standards and levels of achievement have definately improved in both areas and neither party should rely upon past efforts as indicators of future direction. Please feel free, as always, to contact me or Tom with any problems or concerns regarding the permitting of Atlas Minerals' mines.

Sincerely yours,


JAMES W. SMITH, JR.
COORDINATOR OF MINED LAND DEVELOPMENT

JWS/TNT/tck

cc: Thomas Tetting, DOGM
Sue Linner, DOGM
Tom Portle, DOGM